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Attorneys for Nancy Isaacson, Chapter 7 Trustee

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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In re:	:	
	:	Case No. 15-17178 (SLM)
DC PLASTICS, INC,	:	
	:	Chapter 7
Debtor.	:	
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**NOTICE OF MOTION OF CHAPTER 7 TRUSTEE FOR AN ORDER (1)
AUTHORIZING AND APPROVING THE SALES OF CERTAIN ASSETS OF THE
DEBTOR'S ESTATE FREE AND CLEAR OF LIENS, CLAIMS, INTERESTS, AND
ENCUMBRANCES PURSUANT TO 11 U.S.C. §§ 105 AND 363; (2) APPROVING
BIDDING PROCEDURES; (3) WAIVING THE 14 DAY STAY PERIOD
PURSUANT TO FED.R.BANKR.P. 6004(h); AND (4) RELATED RELIEF**

TO: ALL PARTIES ON THE ATTACHED SERVICE LISTS A AND B.

PLEASE TAKE NOTICE that on 19TH day of September, 2017, or as soon thereafter as counsel may be heard, the undersigned attorneys for Nancy Isaacson, Chapter 7 Trustee (the "Trustee") for the estate (the "Estate") of DC Plastics, Inc., the captioned debtor (the "Debtor"), will apply to the Honorable Stacey L. Meisel, in the United States Bankruptcy Court for the District of New Jersey (the "Court"), Martin Luther King, Jr. Federal Building, 50 Walnut Street, Newark, New Jersey, for entry of an Order authorizing and approving the sale of certain assets of the Debtor's Estate to Oak Point Partners, Inc. ("Oak Point"), specifically: (i) the ASK Settlement Rights; and (ii) all other remaining property of the Estate, other than the ASK Settlement Rights, consisting of known or unknown assets or claims which have not been previously sold, assigned or transferred, but *specifically excluding* (a) cash held at of the date of

the Purchase Agreements by the Debtor or Trustee in bank accounts earmarked for distribution to creditors and/or payment of professional fees; and (b) the Purchase Prices, both via private sale (“Remnant Assets”). The sales shall be pursuant to Sections 363 and 105 of the Bankruptcy Code. The sales shall be free and clear of liens, claims, and encumbrances, with valid liens, claims and encumbrances to attach to the proceeds of the sales. Trustee further seeks approval of the Bidding Procedures and related relief (the “Motion”)¹.

PLEASE TAKE FURTHER NOTICE that the Trustee requests a waiver of the 14 day stay period pursuant to Fed.R.Bankr.P. 6004(h).

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion must be made in writing and in the form prescribed by the Federal Rules of Bankruptcy Procedure and the District of New Jersey Local Bankruptcy Rules, and must be filed with this Court and served upon and received by the following parties on or before September 12, 2017: (i) counsel to the Trustee, Greenbaum, Rowe, Smith & Davis LLP, Attn: Nancy Isaacson, Esq., 75 Livingston Avenue, Suite 301, Roseland, New Jersey 07068-3701; and (ii) counsel to Oak Point, (a) at Oak Point Partners, Inc., Attn: Janice Alwin, Esq., 5215 Old Orchard Road, Suite 965, Skokie, IL 60077; and (b) janice@oakpointpartners.com.

PLEASE TAKE FURTHER NOTICE that, in the event that timely objections are not filed with the Court and served upon the Trustee as provided in D.N.J. LBR 9013-1(a) and (f), the Motion shall be deemed uncontested and the Court may, in its discretion, grant the requested relief without a hearing.

¹ Capitalized terms not defined herein shall have the meaning ascribed in the Motion.

PLEASE TAKE FURTHER NOTICE that the sales are subject to higher and better offers as provided in the Motion.

GREENBAUM ROWE SMITH & DAVIS, LLP
Attorneys for Trustee

By: /s/ Nancy Isaacson
NANCY ISAACSON

Dated: August 24, 2017

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The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

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